

**RECEIVED
CENTRAL FAX CENTER****APR 16 2007**

-13-

Remarks

Claims 1-29 are pending in this application. Claims 25 and 27-29 have been withdrawn. Claims 5-6 and 17-18 have been cancelled. Claims 1, 15, and 26 have been amended. Support for the amendments can be found throughout the Specification, and in particular, in claims 5-6 and 17-18 as originally filed.

Rejection under 35 U.S.C. 102(e)

Claim 26 stands rejected under 35 USC 102(e) as anticipated by Fleming. The Examiner cites Fleming to disclose "a hydrophilic coating to enhance fluid transport by coating . . . using a surfactant solution that includes from about 0.05% to about 0.5%, by weight, branched chain sodium dodecylbenzene sulfonate . . . and from about 0.10% to about 0.6% by weight ethoxylated acetylenic diol . . . in a solvent including a 70/30 mix of isopropyl alcohol and water. . . ."

Applicants have amended independent claim 26 to recite that the surfactant composition is dried. Fleming fails to teach that the hydrophilic coating is dried. Accordingly, Fleming fails to teach every element of the claims as amended, and as such, cannot anticipate the amended claims. Applicants expressly reserve the right to overcome any future rejections under 35 USC 102(e) as anticipated by Fleming by affidavit pursuant to 37 CFR 1.132.

Rejection under 35 USC 102(b)

Claims 1, 4, 5, 8-11, 13-17, 20, 21, 23, and 26 stand rejected under 35 USC 102(b) as anticipated by or, in the alternative, under 35 USC 103(a) as obvious over UK Patent GB 1235918 (Weigel hereinafter). The Examiner cites Weigel to teach "a coating on a surface comprising an anionic surfactant . . . and a nonionic surfactant. . ." The Examiner concludes that "Weigel teaches the same composition as claimed" and, and thus, the functional parameters such as "the results of the Spreading Drop Test . . . and the contact angle on the hydrophilic surface" would inherently be the same.

Applicants have amended claims 1, 15 and 26 to recite the surfactants in claims 6 and 18. As amended, Weigel fails to teach every element of Applicants' invention as claimed. Further, Applicants note that Weigel fails to teach a combination of a surfactant and stabilizer that forms a dried hydrophilic coating with the claimed physical properties. Weigel rather teaches successive surfactant layers obtained by

-14-

electrochemical deposition induced by electrochemical charge while in solution, and subsequently heated). See col. 1, lines 40 to col. 2, lines 46-53; col. 2, lines 87 to col. 3, lines 1-20. For at least the above reasons, Applicants submit that claims 1, 4-5, 8-11, 13-17, 20-21, 23, and 26 as amended are not as anticipated by, or in the alternative, obvious over Weigel.

Claims 15-18, 20, 23-24 and 26 have also been rejected under 102(b) as anticipated by, or in the alternative, under 103(a) as obvious over EP Patent No. 1101803 (Kanno). The Examiner cites Kanno to teach "a coating composition for use on substrates . . . comprising 0.05 to 2% of a surfactant or combination of surfactants . . . in water and water soluble solvents such as methanol, ethanol . . . (citations omitted)." The Examiner concludes that "Kanno teaches the same composition as claimed" and, and thus, the functional parameters such as "the results of the Spreading Drop Test . . . and the contact angle on the hydrophilic surface" would inherently be the same.

Applicants have amended claims 1, 15 and 26 to recite the surfactants in claims 6 and 18. As amended, Kanno fails to teach every element of Applicants' invention as claimed. Kanno discloses an undercoating composition for use as an intermediate layer for improving the coatability of photocatalytically hydrophilifiable or photoexcitable coating. Applicants note that Kanno fails to teach a combination of a surfactant and stabilizer that forms a dried hydrophilic coating with the claimed physical properties. For at least the above reasons, Applicants submit that claims 15-18, 20, 23-24 and 26 as amended are not as anticipated by, or in the alternative, obvious over Kanno.

Rejections under 35 USC 103(a)

Claims 1-24 and 26 are rejected as being obvious over US Patent No. 4,784,789 (Jeschke) in view of US Patent No. 6,313,182 (Lassila). The Examiner cites Jeschke to disclose a composition / . . . comprising 0.02 to 5 % of an amphoteric polymer-including anionic surfactants . . . and a surfactant- including alkylbenzene sulfonates . . . in a 20:1 to 1:1 ratio dissolved in water and a water soluble solvent. . . (citations omitted). The Examiner acknowledges that Jeschke does not expressly disclose acetylenic diol ethylene oxide adduct, and relies on Lassila for that disclosure.

Applicants respectfully disagree. Jeschke discloses high molecular weight amphoteric polymers in the presence of surfactant(s). First, the Examiner appears to

-15-

equate the amphoteric polymers in Jeshke with the surfactant component of Applicant's claims, and the surfactant of Jeshke with the stabilizer component of Applicants' claims. If so, Applicants disagree with the Examiners' classification of the amphoteric polymers as anionic surfactants.

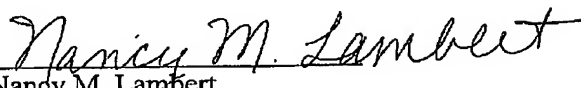
In addition, there is nothing in Jeshke to suggest that a solution containing amphoteric polymers would exhibit the the functional parameters of Applicants' claims such as "the results of the Spreading Drop Test . . . and the contact angle on the hydrophilic surface." Obviously, removal of the amphoteric polymer of Jeshke would destroy the functionality of the composition taught by Jeshke.

Further, Applicants disagree that one skilled in the art would substitute the teaching of the acetylenic diol ethylene oxide adduct of Lassila with the surfactants in Jeshke, or that either reference provides the motivation to do so. Rather, Lassila teaches the use of the adducts instead of nonionic and anionic surfactants (see col. 1, lines 31-44).

For at least the above reasons, Applicants submit that claims 1-24 and 26 as amended are not obvious over Jeshke in view of Lassila.

All outstanding objections and rejections are believed to have been met and overcome. If a telephonic conference with Applicants' undersigned representative would be useful in advancing the prosecution of the present application, the Examiner is invited to contact the undersigned at (651) 733-2180. A notice of allowance for all pending claims is respectfully solicited.

Respectfully submitted,


Nancy M. Lambert
Registration No. 44,856
Attorney for Applicants

4-16-2007

Office of Intellectual Property Counsel
3M Innovative Properties Company
P.O. Box 33427
St. Paul, Minnesota 55133-3427
(651) 733-2180
Facsimile: (651) 736-3833